

March 15, 2018

BY ECF

The Honorable Jesse M. Furman
U.S. District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: New York Wheel Owner LLC v. Mammoet-Starneth, LLC, et al.
No. 17-cv-04026 (JMF)

Dear Judge Furman:

This firm represents Defendants Mammoet USA North Inc., Mammoet USA Holdings, Inc. (n/k/a Mammoet Americas Holding, Inc.), Starneth LLC, Mammoet Holding B.V. and Starneth B.V. (the "non-Debtors") in the above action. On December 22, 2017, the Court stayed this action for a period of 60 days (until February 20, 2018) in light of the bankruptcy case filed by Mammoet-Starneth LLC and directed the parties to report one week prior to the expiration of the stay as to whether the stay should be extended. At the request of the parties, the Court extended the stay until March 22, 2018 with the same direction to submit a joint letter a week before the expiration of the stay.

On behalf of all parties, we submit this joint letter to request a further extension of the stay for an additional 30 days (*i.e.*, until April 21, 2018). In our last letter, the parties advised that they were participating in a mediation in an effort to resolve their disputes. That effort has borne fruit, but the parties are still working toward a settlement and need some more time. The parties expect that process to run its course over the next 30 days, at which point the parties will be in a better position to report on the impact to the case before this Court. If the Court is amenable to this request, we suggest providing a similar joint report one week before the expiration of the extended stay deadline.

Respectfully submitted,

/s/ Jonathan S. Jemison

Jonathan S. Jemison

cc: All Counsel of Record (via ECF)